

INITIAL CONFERENCE QUESTIONNAIRE

1. If not yet made, date for completion of automatic disclosures required by Fed. R. Civ. P. 26(a) or, where applicable, Local Civil Rule 33.2 of this court.: 10/23/21
2. Number of depositions by plaintiff(s) of: parties 1 non-parties 2
3. Number of depositions by defendant(s) of: parties 3 non-parties 1
4. Number of depositions which the parties expect may last longer than the seven hour limit under Fed. R. Civ. P. 30(d)(2): party 0 non-party 0
5. Number of expert witnesses of plaintiff(s): 0 medical 1 non-medical
Date for expert report(s): 2/1/23
6. Number of expert witnesses of defendant(s): 0 medical 1 non-medical
Date for expert report(s): 2/1/23
7. Maximum number of requests for admission by: plaintiff(s) 100 and defendant(s) 100
(Note: requests must be served at least 30 days before the discovery deadline)
8. Date for completion of all discovery: 4/1/23
N.B. All discovery is to be initiated so as to be completed on or before the date the parties insert at paragraph 8.
9. Date by which plaintiff(s) will supply his or her pretrial order materials to defendant(s):
5/1/23
10. Date by which the parties will submit a pretrial order with trial briefs and either (1) proposed findings of fact and conclusions of law for a non-jury trial, or (2) proposed voir dire questions and proposed jury instructions, for a jury trial: 6/1/23
11. Is there any limitation to be placed on discovery, including any protective or confidentiality order(s)? No If yes, please provide a short statement of the limitation(s) needed.

12. Is there any discovery issue(s) on which the parties, after a good faith effort, were unable to reach agreement? Yes If yes, please provide a short statement of the issue(s).
Defendant is not willing to provide discovery voluntarily and thus Plaintiff will need to seek party discovery under Chapter 1 of the Hague Evidence Convention.
Date: _____ Date: 10/7/21

Signature of Pro Se Plaintiff or
Counsel to Plaintiff(s)

Signature of Counsel to Defendant(s)
AUSA Jennifer Jude